

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION	No. 2:18-md-02323-AB MDL No. 2323
Kevin Turner and Shawn Wooden, on behalf of themselves and others similarly situated, Plaintiffs, v . National Football League and NFL Properties LLC, successor-in-interest to NFL Properties, Inc., Defendants.	No. 2:12-md-02323-AB MDL No. 2323 Hon. Anita B. Brody
THIS DOCUMENT RELATES TO: ALL ACTIONS	

**CLASS REPRESENTATIVE KEVIN TURNER'S COUNSEL
POLSINELLI'S NOTICE OF INTENT TO ARGUE**

We are counsel for the Estate of the Class Representative, Kevin Turner, in the above captioned matter. Our representation is under a *pro bono* fee engagement. Robert Penza is respectfully requesting an opportunity to be heard in person at the **HEARING** on May 15, 2018 concerning allocation of class benefit fees among counsel representing the class. Mr. Penza only wants to take five minutes of the Court's time to provide some relevant information to the Court from his personal knowledge and experience in this matter. Our firm is not seeking an allocation of any class benefit fees.

We entered our appearance in this matter on behalf of the Estate of Kevin Turner on December 14, 2016. At that time we filed a Motion to Resolve Attorney Fee Dispute with Kevin Turner's prior counsel, Podhurst Orseck P.A. (ECF No. 7029). Podhurst filed its opposition to

the Turner Estate's fee dispute motion (ECF No. 7071) and the Turner Estate filed its Reply to Podhurst's opposition (ECF 7114). Other Class Members have filed joinder Motions in support of the Turner Estate's fee dispute motion. The fee dispute issues remain unresolved and this motion remains pending before the Court.

Respectfully submitted,

/s/ R. Montgomery Donaldson

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Dated: May 11, 2018

*ATTORNEYS FOR ESTATE OF KEVIN
TURNER*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the forgoing document was filed electronically with the Clerk of the Court using CM/ECF System on May 11, 2018. The CM/ECF System will serve all counsel of record.

POLSINELLI PC

/s/ R. Montgomery Donaldson

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Dated: May 11, 2018

Attorney for Estate of P. Kevin Turner